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ATTORNEYS FOR DEFENDANTS  
OAKLAND UNIFIED SCHOOL DISTRICT,  
JEFF GODOWN, DONALD PERRIER

**UNITED STATES DISTRICT COURT  
DISTRICT OF NORTHERN CALIFORNIA**

SARU JAYARAMAN, STEPHEN YOUNG,  
MARTIN BOYDEN, ZACH NORRIS,  
DEIRDRE SNYDER, MIKE LOUDEN,  
AMY HARUYAMA, and ERIC  
PETTENGILL,

### Claimants,

VS.

OAKLAND UNIFIED SCHOOL DISTRICT;  
JEFF GODOWN, POLICE CHIEF;  
DONALD PERRIER, POLICE SERGEANT,  
and DOES 1 through 20.

## Respondents.

) Case No. 3:20-cv-00685-VC  
)  
) **STIPULATION AND [PROPOSED]**  
) **ORDER TO VACATE**  
) **DEFENDANTS' DEADLINE TO**  
) **ANSWER OR OTHERWISE**  
) **RESPOND TO PLAINTIFFS' FIRST**  
) **AMENDED COMPLAINT AND TO**  
) **SCHEDULE THE FILING OF AND**  
) **RESPONSE TO A SECOND**  
) **AMENDED COMPLAINT**  
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The parties to the above captioned litigation hereby stipulate by and through their undersigned counsel of record as follows:

Plaintiffs filed their First Amended Complaint in this matter on April 10, 2020. (ECF No. 28.) On April 15, 2020, the Court ordered defendants to Answer or move to

1 dismiss plaintiffs' First Amended Complaint within 14 days of the Court's Order. (ECF  
2 No. 29.). Pursuant to this Court's order, Defendants' response to the First Amended  
3 Complaint was due filed by April 29, 2020.

4 On April 15, 2020, the parties exchanged initial disclosures. In doing so,  
5 plaintiffs learned the identities of the parties previously presented as DOE defendants.  
6 Plaintiffs intend to file a Second Amended Complaint to name the identities of the DOE  
7 defendants.

8 Defendants have identified issues with plaintiffs' First Amended Complaint that  
9 they had intended to address with a Motion to Dismiss. However, the parties agree that  
10 judicial economy may best be served by meeting and conferring over plaintiffs'  
11 proposed Second Amended Complaint to determine whether it resolves defendants'  
12 concerns.

13 The parties agree that the defendants do not have to respond to the First  
14 Amended Complaint in view of the plaintiffs' intention to file a Second Amended  
15 Complaint.

16 Plaintiffs will provide defendants with the proposed Second Amended Complaint  
17 by April 27, 2020. Plaintiffs will redline or highlight the changes incorporated into the  
18 proposed Second Amended Complaint. The parties will then meet and confer regarding  
19 the proposed Second Amended Complaint

20 If the parties are successful in their efforts to meet and confer, the parties will  
21 stipulate to a proposed order permitting the filing of a Second Amended Complaint.  
22 The stipulation and proposed order will require defendants to Answer the Second  
23 Amended Complaint by May 22, 2020.

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However, if the parties cannot resolve their dispute regarding the Second Amended Complaint by May 8, 2020, defendants will stipulate to the filing of plaintiffs' Second Amended Complaint on May 8, 2020 and will file their Motion to Dismiss by May 22, 2020.

It is so stipulated.

Dated: April 25, 2020

## SIEGEL, YEE, BRUNNER & MEHTA

By /s/*EmilyRose Johns*  
EmilyRose Johns

Attorneys for Plaintiffs  
SARU JAYARAMAN, STEPHEN YOUNG,  
MARTIN BOYDEN, ZACH NORRIS,  
DEIRDRE SNYDER, MIKE LOUDEN,  
AMY HARUYAMA, and ERIC PETTENGILL

Dated: April 25, 2020

LEONE & ALBERTS

By *s/Claudia Leed*  
Claudia Leed

Atorneys for Defendants  
OAKLAND UNIFIED SCHOOL DISTRICT,  
JEFF GODOWN, and DONALD PERRIER

1 **[PROPOSED] ORDER**  
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3 Pursuant to stipulation and good cause showing, IT IS SO ORDERED.  
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5 Dated: April 27, 2020  
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9 Hon. Vince Chhabria  
10 United States District Judge  
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